

their reputation if they were associated with the Thorntail Hard Agave brand.

3. The websites thorntailhardagave.com, kompletedesignbuild.com, and anonimcard.com include images and captions stating or implying that Thorntail Hard Agave is urine and “shit,” that funding for Thorntail will be used to purchase drugs, and that I am an alcoholic and a cocaine addict who conducts other illegal activity. All of these statements about Thorntail Hard Agave and myself are false.

4. In addition to the interference with a strategic partnership, the contents of these websites are interfering with Thorntail Hard Agave's ability to secure purchase orders, as well as putting stress on my personal and professional life. I am specifically concerned that large retail chains may pull Thorntail Hard Agave products from their shelves, or refuse to stock it, due to the defamatory content of the Infringing Website.

5. Attached as **Exhibit 1** are screenshots taken from the thorntailhardagave.com website.

I swear under penalty of perjury under the laws of the United States that the statements in this declaration are true and correct to the best of my recollection.

EXECUTED at Seattle, Washington, on this 26th day of December, 2023.

/s/ Joel VandenBrink
Joel VandenBrink

DECLARATION OF JOEL VANDENBRINK - 2

LOWE GRAHAM JONES PLLC



1325 Fourth Avenue, Ste. 1130
Seattle, Washington 98101
206.381.3300 • F: 206.381.3301

EXHIBIT 1

Screenshot 1 – Disparaging Statements**Regarding Thorntail Products**

<http://thorntailhardagave.com>



For those with refined palates. Made from only the freshest ingredients. All organic and shit. ;)

Screenshot 2 – Disparaging Statements**Regarding Cocaine Addiction**

<http://thorntailhardagave.com>



Yes sir, I'll definitely use this seed money on setting up a production facility.

Screenshot 3 – Disparaging Statements
Regarding Reliability of Plaintiffs

<http://thorntailhardagave.com>



For those who find thrill in the uncertain. Who appreciates a safe, steady return anyway?

Screenshot 4 – Disparaging Statements
Regarding Alcoholism

<http://thorntailhardagave.com>



Because being a sober father is secondary to getting to PARTYYYYYYY.

Screenshot 5 - Disparaging Statements
Regarding Settled Lawsuit

<http://thorntailhardagave.com>



#2 of 2 | Joel VandenBrink, founder and ex-CEO of South Cider, is being sued by the company for allegedly falsifying sales to earn millions. (Mark B. Bauchle / South Cider, file)

Investors, rejoice! Who needs returns when you can fund his definitely legal endeavors?

Screenshot 6 -- Website Source Code

<http://thorntailhardagave.com>

```
Line wrap □
1 <!--
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29 -->
30 <!DOCTYPE html>
```

**FUCK
YOU
JOEL**